

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Marlettia Smith :
 :
Debtor : BANKRUPTCY NO.: 17-10191-ELF

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Certification of Default, respectfully represents the following:

1. The Debtor has made post-petition payments in accordance with her stipulation dated November 1, 2017, and is currently gathering proof of said payments.
2. Any past-due payments actually due at this time will be cured promptly.

WHEREFORE, Debtor prays that the Movant's request for relief be denied.

Date: March 20, 2018

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor